

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Case No. 15-CR- 948-BEN

Plaintiff,

I N F O R M A T I O N

v.

TODD MACALUSO,

Title 18, U.S.C., Sec. 1343-
Wire Fraud

Defendant.

The United States Attorney charges:

COUNT 1

(18 U.S.C. § 1343)

From at least July 2012 and until November 2013, in the Southern District of California and elsewhere, defendant TODD MACALUSO knowingly devised and intended to devise, with the intent to defraud, a material scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and by intentional concealment and omission of material facts.


On about January 30, 2013, within the Southern District of California, Defendant TODD MACALUSO, for the purpose of executing such scheme and artifice to defraud and attempting to do so, caused to be transmitted a funding

1 agreement by means of wire and radio communication in
2 interstate commerce.

3 In violation of Title 18, United States Code, Section
4 1343.

5 LAURA E. DUFFY
6 United States Attorney

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8 4/14/15
9 DATED

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12 W. MARK CONOVER
13 Assistant U.S. Attorney
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